

**To:** Rebecca Lloyd

**Cc:** Sarah Stevenson

**Subject:** KCDC Proposed District Plan - comments on #216 Halstead

Rebecca,

Further to your email request and our subsequent discussion, here is my response to the Halstead submission.

There are two distinct hazards shown on Mr Halstead's property: the fill control area, and the flood ponding area. The issue raised by Mr Halstead appears to be around the fill control area only.

The hearing evidence comments on a number of aspects of the Beca report. However, none of the comments appear to be particularly substantial and would not, in my opinion, materially change the assumptions or conclusions in the Beca report.

As noted by Mr Halstead, the fill control area is drained by a 300mm diameter pipe towards Cedar Drive. It is unlikely that this would be able to convey the 100 year runoff plus climate change, particularly once the land on 240 Kāpiti Road was developed, and therefore consideration must be given to secondary flow paths. The land in question is about 1m below the lowest adjacent land, so any runoff beyond the pipe capacity has no secondary flow outlet, and would currently pond safely in the fill control area. However, were that area to be filled and the flood storage lost, there is a risk that any excess flow (beyond the pipe capacity) would spill west onto the developed properties along Cedar Drive.

The PDP provisions on fill control simply identify the potential risk and require the developer, at the time that development is undertaken, to demonstrate how that risk is to be managed to avoid effects on other properties. It does not, as Mr Halstead asserts, prevent that piece of the land from being developed. Mr Halstead's submission does, in fact, identify that for the land to be developed it would need to be filled, and he points to some of the possible solutions that could be implemented at that time to avoid adverse effects.

In my opinion the designation of fill control area is appropriate for this piece of land, and should remain in place. It serves to highlight the need for flood storage and secondary flow to be addressed (in accordance with DP rules) when the land is developed.

Regards

**Graham Levy**

Senior Technical Director - Water Resources Engineering  
Beca